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Attorneys for Defendants

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

SHARON CHAND,)	No. 3:21-cv-07773-RS
)	
Plaintiff,)	JOINT REQUEST TO CONTINUE CASE
)	MANAGEMENT CONFERENCE AND SET
v.)	CASE SCHEDULE;
)	ORDER
MICHAEL S. REGAN, Administrator,)	
Environmental Protection Agency,)	Current CMC Date: August 31, 2022
)	Time: 11:00 a.m.
Defendant.)	
)	

Plaintiff Sharon S. Chand (“Plaintiff”), and Defendant Michael S. Regan (“Defendant”), by and through undersigned counsel, hereby STIPULATE and respectfully REQUEST that the Court vacate and continue the Case Management Conference (“CMC”), presently scheduled for August 31, 2022, until October 20, 2022, and adopted the further case schedule as set forth below.

This action, filed on October 5, 2021, includes four causes of action related to claims for employment discrimination. *See* Dkt. 1. Defendant was served on December 27, 2021. Defendant moved to dismiss the Complaint on February 25, 2022. *See* Dkt. 16. On July 1, 2022, the Court granted the motion to dismiss for two of Plaintiff’s claims, and denied the motion for Plaintiff’s two remaining claims. *See* Dkt. 27. The Court directed that Plaintiff file an Amended Complaint within 30 days, and Plaintiff did so on August 1, 2022. *See* Dkt. 32. Defendant expects to move to dismiss the two claims

that were previously dismissed in the Court's July 1, 2022 order, and expects to answer the two claims for which the previous motion to dismiss was denied.

On August 10, 2022, the parties discussed the upcoming case schedule as the Court had recently moved the upcoming Case Management Conference to August 31, 2022, a date that counsel for Defendant is unavailable due to official travel. Plaintiff also expressed that she would be unavailable in August and part of September due to forthcoming medical treatment. The parties therefore discussed a case schedule that accommodated all of these issues.

Accordingly, the parties request that the CMC scheduled for August 31, 2022, be vacated and continued until October 20, 2022, and that the following case schedule be adopted:

Friday, September 16	Motion to Dismiss due for any claims where Defendant intends to move to dismiss
Friday, September 30	Opposition to Motion to Dismiss due
Friday, October 7	Reply due
Thursday, October 13	Case Management Conference Statement Due
Thursday, October 20 11 a.m.	Case Management Conference
Thursday, October 27 1:30 p.m.	Hearing on Motion to Dismiss
Thursday, November 10	General Order 71 disclosures due
14 days after motion to dismiss is decided or final complaint is filed	Answer due

SO STIPULATED.

Respectfully submitted,

STEPHANIE M. HINDS
United States Attorney

Dated: August 10, 2022

By: /s/ Michael A. Keough
MICHAEL A. KEOUGH
Assistant United States Attorney
Attorney for Defendants

1 Dated: August 10, 2022

By: **/s/ Sharon S. Chand
SHARON S. CHAND

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3 Plaintiff *Pro Se*


4 ** Pursuant to Civ. L.R. 5-1(i)(3), the filer of the document
5 has obtained approval from this signatory.
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ORDER

IT IS HEREBY ORDERED that the parties shall comply with the following case schedule:

Friday, September 16	Motion to Dismiss due for any claims where Defendant intends to move to dismiss
Friday, September 30	Opposition to Motion to Dismiss due
Friday, October 7	Reply due
Thursday, October 13	Case Management Conference Statement Due
Thursday, October 20 11 a.m.	Case Management Conference
Thursday, October 27 1:30 p.m.	Hearing on Motion to Dismiss
Thursday, November 10	General Order 71 disclosures due
14 days after motion to dismiss is decided or final complaint is filed	Answer due

Dated: August 10, 2022


 HON. RICHARD SEEBORG
 United States District Judge